Case 3:08-cv-05047-MHP Document 22 Filed 12/04/08 Page 1 of 3

1 2 3 4 5 6 7	Royal F. Oakes (080480), roakes@bargerwolen. Michael A. S. Newman (205299), mnewman@b James C. Castle (235551), jcastle@bargerwolen. BARGER & WOLEN LLP 633 West Fifth Street, 47th Floor Los Angeles, California 90071 Telephone: (213) 680-2800 Facsimile: (213) 614-7399 Attorneys for Defendants Metropolitan Life Insurance Company and Metropolitan Insurance and Annuity Company	argerwolen.com
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	MARAT UDLER, individually and as) CASE NO.: CV 08 5047 MHP
11	Administrator of the ESTATE OF RITA AVRUTIN UDLER,) SECOND JOINT STIPULATION OF
12	Plaintiff,) COUNSEL TO EXTEND TIME FOR) DEFENDANT METROPOLITAN LIFE
13	vs.) INSURANCE COMPANY AND) METROPOLITAN INSURANCE AND
14	METROPOLITAN LIFE INSURANCE) ANNUITY COMPANY TO FILE) RESPONSIVE PLEADINGS BY SEVEN
15	COMPANY, a corporation; METROPOLITAN INSURANCE AND) DAYS
16	ANNUITY COMPANY, a corporation; and DOES 1 through 50,) [Local Rule 7-12]
17	Defendants.	<u> </u>
18) Complaint Filed: September 11, 2008
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BARGER & WOLEN LLP 633 W. FIFTH ST. FORTY-SEVENTH FLOOR LOS ANGELES, CA 90071 (213) 680-2800

Pursuant to Rule 7-12 of the Local Rules of Practice for the United States District Court for the Northern District of California ("Local Rules"), Plaintiff Marat Udler, Individually and as Administrator of the Estate of Rita Avrutin Udler ("Plaintiff") and Defendants Metropolitan Life Insurance Company ("MetLife") and Metropolitan Insurance and Annuity Company ("MIAC") (collectively "Defendants"), by and through their respective counsel, hereby stipulate to extend the time within which Defendants may answer or otherwise respond to the initial Complaint filed in San Francisco County Superior Court on September 11, 2008, served upon Defendants on October 6, 2008, and removed to this Court on November 5, 2008 based upon diversity of citizenship jurisdiction.

Specifically, Defendants shall have an additional seven (7) days from the response date in which to answer or otherwise respond, which at present is due on November 28, 2008 (pursuant to a previously filed stipulation), such that a pleading filed on or before November December 5, 2008 shall be deemed timely. Good cause exists for this extension because Defendants have only recently retained counsel, and additional time is needed to gather all relevant documents and all matters previously reviewed and considered in connection with Plaintiff's claims, to formulate its interim litigation strategy and to prepare its responsive pleadings.

Pursuant to Local Rule 7-12, this stipulation need not be approved by the judge.

DATED: December **1**, 2008

BARGER & WOLEN LLP

By:

ROYAL F. OAKES MICHAEL A. S. NEWMAN

JAMES C. CASTLE

Attorneys for Defendants

Metropolitan Life Insurance Company and Metropolitan Insurance and Annuity

Company

Case 3:08-cv-05047-MHP Document 22 Filed 12/04/08 Page 3 of 3

1	DATED: December, 2008	GUY KORNBLUM & ASSOCIATES
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3		By: Jell July
4		GU Y O. K ORNBLUM JILL A. WHITBY
5		Attorneys for Plaintiff Marat Udler, Individually and as Administrator of the Estate of Rita
6		Administrator of the Estate of Rita Avrutin Udler
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9		STATES DISTRICT COLLEGE
10		STATION
11		TOTAL TOTAL STATE OF THE PARTY
12		IT IS SO ORDERED
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14		Judge Marilyn H. Patel
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